

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

JOHN ADKISSON,)	
)	
Plaintiff,)	No. 1:09-cv-04660
)	Jury Trial Requested
)	
)	
C/O JOHN TEDESCO, in his individual)	
and his official capacity as an)	
OFFICER OF COOK COUNTY,)	
)	
Defendant.)	

AMENDED MOTION FOR LEAVE TO FILE FIRST AMENDED COMPLAINT

Plaintiff, John Adkisson (“Adkisson” or “Plaintiff”), through his attorneys Jon Zimring and David I. Curkovic, pursuant to Fed. R. Civ. P. 15(a)(2), requests that this Court grant Plaintiff leave to file a First Amended Complaint, and further states as follows:

1. On or about August 11, 2009, Plaintiff filed a *pro se* complaint in this matter [DE6].
2. On or about January 29, 2010, Defendant filed a Motion to Dismiss Plaintiff's Complaint [DE17].
3. This Court has recently appointed Jon Zimring to act as Plaintiff's counsel in this matter, and extended the deadline for responding to the Defendant's Motion to Dismiss to July 19, 2010 [DE 28].

4. In lieu of responding to Defendant's Motion to Dismiss, Plaintiff requested that this Court instead permit Plaintiff to file a First Amended Complaint [DE 32].

5. This Court granted Plaintiff leave to file a First Amended Complaint [DE 34].

6. Plaintiff has supplemented and modified its proposed First Amended Complaint, specifically to include the Sheriff of Cook County as a defendant. (A copy of the proposed First Amended Complaint is attached as Exhibit A.)

WHEREFORE, Adkisson requests that this Court grant Adkisson leave to file a First Amended Complaint in this matter, along with such other and further relief as this Court deems just.

Respectfully submitted,

JOHN ADKISSON

By: /s/ David I. Curkovic

One of his Attorneys

Dated: August 4, 2010

Jon Zimring, Esq.
David I. Curkovic, Esq.
190 S. LaSalle St.
Suite 3700
Chicago, Illinois 60603
Phone:(312) 499-6700
Fax: 312-499-6701

CERTIFICATE OF SERVICE

I, David I. Curkovic, an attorney, hereby certify that on August 4, 2010, I caused to be filed Plaintiff's Amended Motion for Leave to File First Amended Complaint using the CM/ECF system, and that a correct copy of the same was served electronically via the CM/ECF system on the party listed below:

Patrick Stephen Smith
Cook County States Attorney's Office Daley Ctr.
500 Richard J. Daley Center
Chicago, IL 60602
(312) 603-2388
Email: patrick.smith@cookcountyil.gov

/s/ David I. Curkovic